

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Special Agent Emily Zagone of the United States Secret Service, being first duly sworn, state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I submit this affidavit in support of a criminal complaint and arrest warrant for Caprice BETHEA, charging her with a criminal violations of 18 U.S.C. § 1344 (Bank Fraud) and 18 U.S.C. § 1028A (Aggravated Identity Theft).

2. I am a duly appointed Special Agent with the United States Secret Service ("USSS") and have been employed as such since June 2017. Through my employment with the USSS, I have gained knowledge in the use of various investigative techniques including the utilization of physical surveillance, undercover agents, confidential informants and cooperating witnesses, consensually monitored recordings, investigative interviews, financial investigations, the service of administrative and grand jury subpoenas, mobile wireless tracking methods, analyzing telephone pen register and caller identification system data, and the execution of search and arrest warrants, including those executed upon physical addresses as well as those executed upon electronic equipment and data storage providers.

3. Throughout my career in law enforcement, I have become familiar with the methods and techniques associated with financial institution fraud and counterfeit trends and tactics. In the course of conducting financial investigations, I have incorporated the use of the following investigative techniques: interviewing informants, cooperating witnesses, victims and subjects; physical surveillance and utilization of various surveillance techniques; supporting undercover operations; participating in mobile wireless tracking missions; and preparing and

executing search and arrest warrants that have led to seizures of counterfeit currency, access devices, and other instruments used to commit financial fraud.

4. Based on my knowledge, training, and experience in the investigation of financial institution fraud, I am familiar with the ways in which fraudsters conduct their business. My familiarity includes the various means and methods by which individuals defraud financial institutions; their use of cellular telephones and social media accounts to facilitate fraud; and their use of code words to describe fraud. I am familiar with the ways that those who commit financial institution fraud are able to carry out their fraud without detection. Financial institution fraud is an ongoing and recurring criminal activity. As contrasted with crimes against persons, which tend to be discrete offenses, crimes such as bank fraud and wire fraud are illicit commercial activities that are characterized by regular, repeated criminal activity.

5. Based on the evidence gathered to date, there is probable cause to believe that Caprice Bethea ("BETHEA") has committed, is committing, and will continue to commit violations of 18 U.S.C. § 1344 (Bank Fraud) and 18 U.S.C. § 1028A (Aggravated Identity Theft).

6. Because this Affidavit is being submitted for the limited purpose of establishing probable cause for an arrest warrant, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause of the violation set forth above. However, I have not excluded any information known to me that would defeat a determination of probable cause. The information contained in this Affidavit is based upon my personal knowledge, my review of documents and other evidence, and my conversations with other law enforcement officers and other individuals.

PROBABLE CAUSE

7. From approximately 2015 to late 2017, SECU and M&T bank investigators identified a suspect who was presenting forged and/or stolen checks at bank ATMs. As discussed further, I identified BETHEA as this suspect. The scheme operated as follows: BETHEA made contact with M&T, SECU, and other bank account customers via social media, social connections, or in random street encounters. BETHEA would deposit the forged and/or stolen checks into the accounts of these account holders using their debit cards to access bank ATMs. BETHEA would then immediately withdraw whatever amount the ATM was authorized to dispense in a transaction (usually between \$500.00 and \$1,000.00, depending on the financial institution). In each instance, BETHEA therefore assumed the identity of both the individual making the deposit into his or her own account, as well as the payee of the check.

8. As part of my investigation, I have reviewed records obtained from SECU. The records described below do not include all the instances wherein BETHEA targeted this institution or other financial institutions. The following transactions, however, are all transactions where SECU bank footage captures BETHEA depositing the check and withdrawing money from the ATM. Investigators identified the following transactions as having been carried out by BETHEA¹:

¹ The names of the victims have been redacted such that only their initials are listed in this affidavit.

Name of Victim/ Account Number	Name/Bank of Originating Checking Account	Branch/ Address	Time	Date	Check Amount	Amount Withdrawn (Loss)
C.P. Account 1	A.G. (M&T Bank)	SECU 27 (418 W. Baltimore Street, Baltimore, MD 21201)	1834 hrs	2/5/2016	\$1,870.00	\$200.00
C.P. Account 2	J.B. (PNC Bank)	SECU 27 (418 W. Baltimore Street, Baltimore, MD 21201)	1835 hrs	2/5/2016	\$1,735.00	\$100.00
M.J. Account 1	Starter Check (M&T Bank)	SECU 129 (10025 Baltimore National Pike, Ellicott City, MD 21042)	1728 hrs	2/12/2016	\$1,800.00	\$0.00
M.J. Account 2	Starter Check (Wells Fargo)	SECU 129 (10025 Baltimore National Pike, Ellicott City, MD 21042)	1730 hrs	2/12/2016	\$1,880.00	\$200.00
A.B. Account 1	Starter Check (M&T Bank)	SECU 69 (8514 Liberty Road, Randallstown, MD 21133)	1829 hrs	2/17/2016	\$1,800.00	\$300.00
A.B. Account 2	Starter Check (Wells Fargo)	SECU 69 (8514 Liberty Road, Randallstown, MD 21133)	1830 hrs	2/17/2016	\$1,850.00	\$0.00
A.D. Account 1	A.G. (M&T Bank)	SECU 40 (103 Chesapeake Center Court, Glen Burnie, MD 21060)	1755 hrs	3/14/2016	\$1,760.00	\$500.00
A.D. Account 2	A.G. (M&T Bank)	SECU 40 (103 Chesapeake Center Court, Glen Burnie, MD 21060)	1800 hrs	3/14/2016	\$1,820.00	\$0.00
W.S. Account 1	B.B. (Navy Federal Credit Union)	SECU 30 (301 W. Preston Street, Baltimore, MD 21201)	1907 hrs	6/7/2016	\$1,250.00	\$0.00
H.B. Account 1	B.B. (Navy Federal Credit Union)	SECU 27 (418 W. Baltimore Street, Baltimore, MD 21201)	0045 hrs	6/7/2016	\$1,600.00	\$0.00
I.C. Account 1	B.B. (Navy Federal Credit Union)	SECU 30 (301 W. Preston Street, Baltimore, MD 21201)	0036 hrs	7/14/2016	\$1,550.00	\$500.00
S.W. Account 1	J.C. (Bank of America)	SECU 6 (7173 Security Blvd, Windsor Mill, MD 21244)	2115 hrs	8/25/2016	\$1,650.00	\$100.00
S.W. Account 2	J.C. (Bank of America)	SECU 6 (7173 Security Blvd, Windsor Mill, MD 21244)	2116 hrs	8/25/2016	\$1,450.00	\$500.00
D.H. Account 1	L.C. (M&T Bank)	SECU 40 (103 Chesapeake Center Court, Glen Burnie, MD 21060)	1409 hrs	10/22/2016	\$1,470.00	\$500.00
D.H. Account 2	L.C. (M&T Bank)	SECU 40 (103 Chesapeake Center Court, Glen Burnie, MD 21060)	1411 hrs	10/22/2016	\$1,350.00	\$300.00
D.H. Account 3	J.C. (Bank of America)	SECU 30 (301 W. Preston Street, Baltimore, MD 21201)	1539 hrs	10/23/2016	\$1,290.00	\$600.00
D.H. Account 4	J.C. (Bank of America)	SECU 30 (301 W. Preston Street, Baltimore, MD 21201)	1541 hrs	10/23/2016	\$1,350.00	\$380.00
A.D. Account 1	D.M. (M&T Bank)	SECU 30 (301 W. Preston Street, Baltimore, MD 21201)	1802 hrs	12/23/2016	\$1,620	\$500.00
A.D. Account 2	D.M. (M&T Bank)	SECU 30 (301 W. Preston Street, Baltimore, MD 21201)	1756 hrs	12/23/2016	\$1,790.00	\$500.00
D.B. Account 1	D.M. (M&T Bank)	SECU 30 (301 W. Preston Street, Baltimore, MD 21201)	1753 hrs	12/23/2016	\$1,630.00	\$500.00
D.B. Account 2	D.M. (M&T Bank)	SECU 30 (301 W. Preston Street, Baltimore, MD 21201)	1754 hrs	12/23/2016	\$1,570.00	\$500.00
					\$34,085.00	\$6,180.00

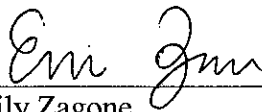
9. Video footage from cameras placed at each of these ATMs demonstrates that BETHEA carried out each of the aforementioned transactions. Investigators reviewed the deposit records for each transactions, and in each instance, BETHEA used the actual account holder's card and associated personal information to complete the deposit and withdrawal. Additionally, each of these transactions was successful at the time of deposit but was returned within three to five business days due to the account being closed or insufficient funds within an active account.

10. Actual loss to SECU included on the chart above includes only the amount immediately withdrawn that was captured in video footage; however, reviews of deposit records indicate transactions carried out at nearby locations immediately following the initial deposit and several days prior to the check being returned for lack of funds. However, these loss amounts for SECU were not included due to lack of video footage of these subsequent transactions.

CONCLUSION

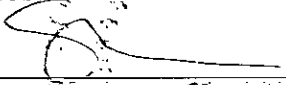
33. Based on the foregoing, I submit that there is probable cause to believe that Caprice BETHEA has committed violations of 18 U.S.C. § 1344 (Bank Fraud) and 18 U.S.C. § 1028A (Aggravated Identity Theft).

WHEREFORE, in consideration of the facts presented, I respectfully request that this Court issue an arrest warrant for Caprice BETHEA.



Emily Zagone
Special Agent
United States Secret Service

Subscribed and sworn to before me this 26th day of March, 2019.



The Honorable Stephanie A. Gallagher
United States Magistrate Judge
United States District Court for the District of Maryland